	Case 5:21-cv-02419-BLF	Document 251	Filed 07/22/25	Page 1 of 4		
		FILED UNI	DER SEAL			
1	KOLLIN J. ZIMMERMANN (SBN 273092) KILPATRICK TOWNSEND & STOCKTON LLP					
2	1801 Century Park East Suite 2300					
3	Los Angeles, California 90067 Telephone: (310) 248-3830	7				
4	Facsimile: (310) 860-0363 kzimmermann@ktslaw.com					
5	Ü					
6	R. CHARLES HENN JR. (pro hac vice) H. FORREST FLEMMING, III (pro hac vice) ERICA CHANIN (pro hac vice)					
7	1100 Peachtree Street NE Atlanta, Georgia 30309	-)				
8	Telephone: (404) 815-6549 Facsimile: (404) 541-3139					
9	chenn@ktslaw.com fflemming@ktslaw.com					
10 11	echanin@ktslaw.com	Dafan dant				
12	Attorneys for Plaintiff/Counte IMPOSSIBLE FOODS INC.	r-Defendant				
13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA					
14	SAN JOSE DIVISION					
15	IMPOSSIBLE FOODS INC.,	a Delaware	Case No. 5:21-cv-	02419-BLF (SVK)		
16 17	corporation,  Plaintiff/Count	er-Defendant	DECLARATION MCGREEVY PE	OF JUDY LUCAS- R DKT. 248		
18	v.		FILED UNDER S	SEAL		
19	IMPOSSIBLE LLC, a Texas l company, and JOEL RUNYO		Judge: Hon. Beth	Labson Freeman		
20		unter-Plaintiffs.				
21						
22						
23	I, Judy Lucas-McGreevy, declare under penalty of perjury that the following is true and correct:					
24	1. I am currently Director, IT Governance & Services at Impossible Foods, Inc.					
25	("Impossible Foods"). I am over the age of twenty-one and am competent to make this declaration					
26	based on my personal knowledge. I submit this supplemental declaration pursuant to the Court's					
27	July 15, 2025 Order. See Dkt. 248.					
28	2. I have been the	Director, IT Gover	nance & Services a	t Impossible Foods since		
	DECLARATION OF JUDY LUCA	S-MCGREEVY			1	

	Case 5:21-cv-02419-BLF Document 251 Filed 07/22/25 Page 2 of 4				
	FILED UNDER SEAL				
1	August 2022. I joined Impossible Foods as a full-time employee in December 2018 (after a period				
2	as a contractor between July 2018 and December 2018), and from December 2018 to August 2022,				
3	I was a Senior Manager in Impossible Foods's IT department. In my current role, I am the head of				
4	Impossible Foods's IT department. William Van Curen discussed his prior conversations with me				
5	about the topics below in his May 23, 2025 Declaration.				
6	3. As a Senior Manager and then as Director, I have personal knowledge of the				
7	document retention policies and practices used by Impossible Foods since December 2018. When I				
8	joined the company, I was educated on the IT department's existing policies and practices,				
9	including for retaining or deleting documents of departing employees.				
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
	DECLARATION OF JUDY LUCAS-MCGREEVY  CASE NO. 5:21-CV-02419-BLF				



